

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

**LELAND FOSTER,**

Plaintiff,

v.

Civil Action No. 1:16-cv-11669-TLL-PTM

**MAHER SAGAR CORPORATION,** a  
Michigan Corporation,

Thomas L. Ludington  
United States District Judge

Defendant.

Patricia T. Morris  
United States Magistrate Judge

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Owen B. Dunn, Jr. (P66315)  
Law Office of Owen B. Dunn, Jr.  
Attorney for Plaintiff  
The Ottawa Hills Shopping Center  
4334 W. Central Ave., Suite 222  
Toledo, OH 43615  
(419) 241-9661 – Phone  
(419) 241-9737 - Facsimile  
[dunnlawoffice@sbcglobal.net](mailto:dunnlawoffice@sbcglobal.net)

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Eric C. Grimm (P58990)  
ERIC C. GRIMM, PLLC  
Attorney for Defendant  
P.O. Box 41  
Muskegon, MI 49443-0041  
734.717.4900  
Fax: 888.502.1291  
[ecrgimm@umich.edu](mailto:ecrgimm@umich.edu)

Valerie J. Fatica  
Attorney for Plaintiff  
4334 W. Central Ave., Suite 222  
Toledo, OH 43615  
(419) 241-9661 – Phone  
[valeriefatica@gmail.com](mailto:valeriefatica@gmail.com)

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**STATUS REPORT OF DEFENDANT**

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NOW COMES Defendant, Maher Sagar Corporation, and respectfully submits its this status report. Defendant, through counsel, has communicated its willingness to conduct a scheduling conference with counsel for the Plaintiff. Defendant has had an engineer conduct a site inspection and prepare a report addressing the allegations in the Complaint, and has furnished that report (within minutes of it arriving in the email inbox of Defendants' counsel) to Plaintiff's counsel.

The parties appear to be within reach of a voluntary settlement, and our time is better spent negotiating a schedule for addressing the items in the engineer's report, and perhaps other items that Plaintiff's counsel wishes to negotiate about – rather than the formal mechanics of litigation.

Both sides have limited resources to work with. Accordingly, we respectfully request that the Court give the parties 28 days to work out a negotiated resolution, before requiring the parties to work out a negotiated solution, before holding a Rule 16 conference and setting a pretrial schedule for customary mechanics of litigation in a contested case.

If Plaintiff is willing, Defendant and counsel remain eager and willing to meet and confer in order to prepare a joint report to the Court. We stand ready to do so at Plaintiff's convenience.

Respectfully submitted,

September 6, 2016

/s/ Eric C. Grimm  
Eric C. Grimm (P58990)  
ERIC C. GRIMM, PLLC  
Attorney for Defendant  
P.O. Box 41  
Muskegon, MI 49443-0041  
734.717.4900  
Fax: 888.502.1291  
[ecrgimm@umich.edu](mailto:ecrgimm@umich.edu)

**CERTIFICATE OF SERVICE**

I certify that this Status Report has been filed electronically on September 6, 2016, through the court's CM/ ECF system, which will automatically serve all counsel of record.

Respectfully submitted,

September 6, 2016

/s/ Eric C. Grimm  
Eric C. Grimm (P58990)  
ERIC C. GRIMM, PLLC  
Attorney for Defendant  
P.O. Box 41  
Muskegon, MI 49443-0041  
734.717.4900  
Fax: 888.502.1291  
ecrgimm@umich.edu